

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
SPRING VALLEY BRANCH; JULIO  
CLERVEAUX; CHEVON DOS REIS; ERIC  
GOODWIN; JOSE VITELIO GREGORIO;  
DOROTHY MILLER; HILLARY MOREAU;  
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL  
DISTRICT and MARYELLEN ELIA, IN HER  
CAPACITY AS THE COMMISSIONER OF  
EDUCATION OF THE STATE OF NEW  
YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

**DECLARATION OF COREY A. CALABRESE IN SUPPORT OF PLAINTIFFS'  
OBJECTION TO THE REPORT AND RECOMMENDATION OF MAGISTRATE  
JUDGE MCCARTHY DATED DECEMBER 29, 2020 CONCERNING PLAINTIFFS'  
MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Corey A. Calabrese, declare as follows:

1. I am an associate of Latham & Watkins LLP, 885 Third Avenue, New York, NY 10022, co-counsel for Plaintiffs with the New York Civil Liberties Union Foundation in the above-captioned matter. I am a member in good standing of the bar of the State of New York and this Court.

2. I respectfully submit this declaration in support of Plaintiffs' Objection to the Report and Recommendation of Magistrate Judge McCarthy dated December 29, 2020 concerning Plaintiffs' Motion for Attorneys' Fees and Costs. I have personal knowledge of the facts and circumstances set forth herein.

3. Attached as **Exhibit A** is a true and correct copy of the transcript of proceedings held before Magistrate Judge Judith C. McCarthy on September 20, 2018.

4. Attached as **Exhibit B** is a true and correct copy of an email dated March 20, 2019 from Adam Adler to Plaintiffs' counsel.

Dated: January 12, 2021

Respectfully submitted,

/s/ Corey A. Calabrese

Corey A. Calabrese